

Serial No.: 09/544,355
Docket No.: 050906-1110

REMARKS

This is a full and timely response to the outstanding final Office Action mailed February 8, 2006 (Paper No. 2). Upon entry of this response, claims 29-56 are pending in this application. Applicant respectfully request that the amendments being filed herewith be entered and requests that there be reconsideration of all pending claims.

1. Rejection of Claims 29-56 under 35 U.S.C. §103

Claims 29-56 have been rejected under §103(a) as allegedly obvious over *Dreke et al.* (6,463,471) in view of *Aravamudan et al.* (6,301,609). Applicant respectfully traverses this rejection. It is well established at law that, for a proper rejection of a claim under 35 U.S.C. §103 as being obvious based upon a combination of references, the cited combination of references must disclose, teach, or suggest, either implicitly, all elements/features/steps of the claim at issue. *See, e.g., In re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988); *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981).

A. Claims 29 and 50

i. The proposed combination does not teach "receiving a client request to update DNS information on a DNS server"

The Office Action alleges that *Dreke et al.* teaches "assigning different IP address by Internet Provider [i.e., DNS server] to a user each time when he/she logs on the Internet [i.e., request to update DNS information, such as receiving a new IP address." (Office Action, p. 5, section 14.A.)

Applicant agrees that the background of *Dreke et al.* discloses dynamic assignment of IP address to clients by an Internet provider. (Col. 1, lines 40-50.) However, Applicant disagrees with the Office Action allegation that dynamic IP address assignment corresponds to "receiving

Serial No.: 09/544,355
Docket No.: 050906-1110

a client request to update DNS information on a DNS server.” A DNS server does *not* assign IP addresses to hosts or clients, either statically or dynamically. Instead, as explained in the instant application:

The DNS server provides a method of converting Internet domain names (e.g., www.site.com) to corresponding IP addresses (e.g., 121.132.143.154) to be understood by computer servers. This process is commonly referred to as “resolving” the domain name into an IP address. The DNS specification may be found in Request for Comments (RFC) 1035. (Specification, p. 5, lines 10-15.)

There is no teaching in *Dreke et al.* that IP address assignment is related in any way to converting domain names. Furthermore, dynamic assignment of IP addresses to clients or hosts is performed not by DNS, but by Dynamic Host Control Protocol (DHCP), which is RFC 2121.

Assigning or updating domain names is a separate and distinct process than assigning or updating IP addresses. Thus, the reference to dynamic IP address assignment in *Dreke et al.* has nothing to do with a DNS server, or with “receiving a client request to update DNS information on a DNS server” as recited in claims 29 and 50.

The remainder of *Dreke et al.* discloses an Internet Presence Information Server (IPIS), and a client that updates a user’s network presence information on the IPIS. As its name suggests, the IPIS in *Dreke et al.* provides information about a particular user’s presence (or absence) on the Internet. In contrast, claims 29 and 50 include “DNS information” and “a DNS server.” As discussed above, DNS relates to mapping domain names to IP addresses. Applicant respectfully submits that the IPIS disclosed in *Dreke et al.* is not a DNS server, and that Internet presence information is not DNS information.

BEST AVAILABLE COPY

Serial No.: 09/544,355
Docket No.: 050906-1110

ii. The proposed combination does not teach "the client being subscribed to a domain name"

The Office Action alleges that *Dreke et al.* teaches "providing service to the register users [col. 2, lines 23-25] and the user being able to receiving a newly network address [col. 4, lines 3-6 & 60-66], i.e., the client being subscribed to a domain name." (Office Action, p. 6, section 14.B.) Applicant disagrees with the Office Action allegation that dynamic IP address assignment corresponds to a "client being subscribed to a domain name." As discussed above, assigning or updating domain names is a separate and distinct process than assigning or updating IP addresses, using two different protocols. Even if the existence of a domain name could be inferred by the general discussion of the Internet contained in *Dreke et al.*, noting the mere existence of a domain name is far from disclosing a particular client subscribing to a domain name, as recited in claims 29 and 50.

iii. The proposed combination does not teach "updating an entry in an IP address table on the DNS server such that the domain name corresponds with the assigned IP address"

The Office Action alleges that *Dreke et al.* teaches "delivering pending events to the user when he/she logs on the network again [col. 7, lines 33-40] i.e., updating the IP address table on the DNS server such that the domain name corresponds with an interactive file." (Office Action, p. 6, section 14.C.) As discussed earlier, the discussion in *Dreke et al.* of dynamic assignment of IP addresses does not disclose, teach, or suggest the above-recited feature because IP address assignment is not a function of a DNS server. Furthermore, *Dreke et al.*'s Internet Presence Information Server (IPIS) is not a DNS server, so any update to the IPIS discussed in *Dreke et al.* is not an update to a DNS server.

BEST AVAILABLE COPY

Serial No.: 09/544,355
Docket No.: 050906-1110

iv. Conclusion

Accordingly, the proposed combination of *Dreke et al.* in view of *Aravamudan et al.* does not teach at least the above described features. Since the proposed combination does not teach at least the above-described features recited in claims 29 and 50, a *prima facie* case establishing an obviousness rejection has not been made. Thus, claims 29 and 50 are not obvious under the proposed combination of *Dreke et al.* in view of *Aravamudan et al.*, and the rejection should be withdrawn.

B. Claim 38

i. The proposed combination does not teach "the client being subscribed to a domain name"

Neither *Dreke et al.* nor *Aravamudan et al.* discloses, teaches, or suggests a client subscribed to a domain name. First, neither reference discusses domain names at all, and as discussed above, IP addresses are distinct from domain names. Second, even if the existence of a domain name could be inferred by the general discussion of the Internet contained in either reference, noting the mere existence of a domain name is far from disclosing a particular client subscribing to a domain name.

ii. The proposed combination does not teach "updating an entry in an IP address table on the DNS server such that the domain name corresponds with the assigned IP address"

The Office Action alleges that *Dreke et al.* teaches "delivering pending events to the user when he/she logs on the network again [col. 7, lines 33-40] i.e., updating the IP address table on the DNS server such that the domain name corresponds with an interactive file." (Office Action, p. 6, section 14.C.) As discussed earlier, the discussion in *Dreke et al.* of dynamic assignment of IP addresses does not disclose, teach, or suggest the above-recited feature because IP address assignment is not a function of a DNS server. Furthermore, *Dreke et al.*'s Internet Presence

BEST AVAILABLE COPY

Serial No.: 09/544,355
Docket No.: 050906-1110

Information Server (IPIS) is not a DNS server, so any update to the IPIS discussed in *Dreke et al.* is not an update to a DNS server.

iii. Conclusion

Accordingly, the proposed combination of *Dreke et al.* in view of *Aravamudan et al.* does not teach at least the above described features. Since the proposed combination does not teach at least the above-described features recited in claim 38, a *prima facie* case establishing an obviousness rejection has not been made. Thus, claim 38 is not obvious under the proposed combination of *Dreke et al.* in view of *Aravamudan et al.*, and the rejection should be withdrawn.

C. Claims 30 and 42

Applicant respectfully submits that claims 30 and 42 are allowable for at least the reason that the proposed combination of *Dreke et al.* in view of *Aravamudan et al.* does not disclose, teach, or suggest at least the feature of “wherein the interactive file comprises a first web page that is configured to provide information to the first client and configured to allow the first client to leave a message for the second client” as recited in claims 30 and 42.

The Office Action alleges that the above-described feature is disclosed in Col. 7, lines 21-40 of *Aravamudan et al.* (Office Action, p. 6, section 14.D.) Applicant respectfully disagrees. This section of *Aravamudan et al.* discloses that the Communication Services Platform checks for pending events when the user’s online presence is detected, and the IM server communicates this event to the client CPE. “Examples of pending events may include...delivery of WebPages or other packetized information either specifically requested by the user or returned as a result of predefined keyword search parameters...” (Col. 7, lines 25-35.)

Aravamudan et al. thus describes a user requesting a web page while online, and delivering the web page *to the same user* when he logs in again. However, claims 30 and 42

Serial No.: 09/544,355
Docket No.: 050906-1110

involve two clients: "configured to allow the first client to *leave a message for the second client*." *Aravamudan et al.* also describes a user performing a search while online, and delivering the search results to the same user when he logs in again. Applicant respectfully submits that delivering search results are not equivalent to "leaving a message" as recited in claims 30 and 42.

Accordingly, the proposed combination of *Dreke et al.* in view of *Aravamudan et al.* does not teach at least the above described features. Since the proposed combination does not teach at least the above-described features recited in claims 30 and 42, a *prima facie* case establishing an obviousness rejection has not been made. Thus, claims 30 and 42 are not obvious under the proposed combination of *Dreke et al.* in view of *Aravamudan et al.*, and the rejection should be withdrawn.

D. Claims 37, 39, 41-49, and 51-56

Since claims 29-56 are allowable, Applicant respectfully submits that claims 37, 39, 41-49, and 51-56 are allowable for at least the reason that each depends from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicant respectfully requests that the rejection of claims 37, 39, 41-49, and 51-56 be withdrawn.

BEST AVAILABLE COPY

Serial No.: 09/544,355
Docket No.: 050906-1110

CONCLUSION

Applicant respectfully requests that all outstanding objections and rejections be withdrawn and that this application and presently pending claims 29-56 be allowed to issue. Any statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and official notice, or statements interpreted similarly, should not be considered well known since the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions. If the Examiner has any questions or comments regarding Applicant's response, the Examiner is encouraged to telephone Applicant's undersigned counsel.

Respectfully submitted,

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